

**STATE OF LOUISIANA**

**DIVISION OF ADMINISTRATIVE LAW**

**LOUISIANA BOARD  
OF ETHICS**

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**DOCKET NO.**

**IN THE MATTER OF**

**ERIN CARUSO**

**AGENCY TRACKING NO. 2015-042**

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**CHARGES**

The Louisiana Board of Ethics voted on December 17, 2015, to and does hereby file the following charge:

**I.**

Stephanie Bachemin was employed as the Executive Director of the St. Bernard Civic Center by St. Bernard Parish from January 10, 2012, until her resignation on March 5, 2014.

**II.**

The Saint Bernard Civic Center is owned by the St. Bernard Parish Government.

**III.**

Erin Caruso is the daughter of Stephanie Bachemin.

**IV.**

Erin Caruso received 16 checks totaling \$2,510 from May 14, 2012 to November 3, 2013 for services performed for the St. Bernard Civic Center. Stephanie Bachemin authorized the payments received from the St. Bernard Civic Center by Erin Caruso. The checks to Erin Caruso

were drawn from the St. Bernard Cultural Center, Inc. bank account, and each check carried the notation "Bartender Expense."

**V.**

La. R.S. 42:1113A provides that no public servant, or a member of such a public servant's immediate family, or a legal entity in which he has a controlling interest shall bid on or enter into any contract, subcontract or other transaction that is under the supervision or jurisdiction of the agency of such public servant.

**VI.**

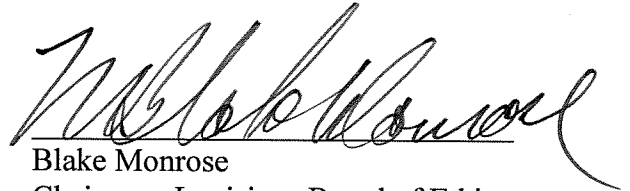
Based on the foregoing facts, Erin Caruso, the immediate family member of Stephanie Bachemin, violated La. R.S. 42:1113A on 16 separate occasions by virtue of her entering into 16 transactions with the St. Bernard Civic Center for the provision of catering/bartending services.

**VII.**

In accordance with La. R.S. 42:1141C(3)(b)(iv), the Board designates Suzanne Quinlan Mooney and Michael Dupree as the Board's trial attorney in this matter.

**WHEREFORE**, the Louisiana Board of Ethics requests that the Ethics Adjudicatory Board (a) conduct a hearing on the foregoing charge; (b) determine that Erin Caruso violated La. R.S. 42:1113B and (c) assess appropriate penalties in accordance with the recommendation of the Louisiana Board of Ethics to be submitted at the hearing.

**[SIGNATURE INFORMATION CONTAINED ON THE FOLLOWING PAGE]**



Blake Monroe  
Chairman, Louisiana Board of Ethics  
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Baton Rouge, LA 70821  
Telephone: (225) 219-5600  
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**CERTIFICATE:**

I hereby certify that a copy of this document has been forwarded to the Respondent by registered/certified mail in accordance with La. R.S. 42:1141E(1)(a), on this 12 day of December, 2015.



Suzanne Quinlan Mooney  
Trial Attorney

**CONTACT INFORMATION:**

RESPONDENT-  
Erin Caruso  
18293 Monga Drive  
Covington, Louisiana 70433